

File No. 26123-KSP

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

AMBER MIRZA,	)	
	)	
Plaintiff,	)	
	)	Case No. 17-cv-04569
v.	)	
	)	Judge Jorge L. Alonso
MAESTRO HEALTH, INC.,	)	Magistrate Judge Maria Valdez
	)	
Defendant.	)	

**DEFENDANT'S**  
**THIRD SET OF DOCUMENT REQUESTS DIRECTED TO PLAINTIFF**

Defendant, MAESTRO HEALTH, INC., (“Defendant”) through its attorneys, Kristine S. Phillips and Sukrat A. Baber, requests that Plaintiff, Amber Mirza (“Plaintiff”), produce for inspection and copying within (30) days of the date hereof to the offices of O’Hagan Meyer LLC, 1 East Upper Wacker Suite 3400, Chicago, IL 60601, the following articles in the possession of, or available to, Plaintiff or her representatives. These requests are continuing and responses must be supplemented by Plaintiff until trial.

**DEFINITIONS**

(a) The word “document” shall mean all types of recorded information or writings of any nature including, but not limited to, originals and copies of speeches, contracts, letters, envelopes, telegrams, memoranda, routing slips, reports, studies, statements, computer printouts, other computer media, E-mails, pamphlets, pleadings, filings, worksheets, tabulations, records of meetings, conferences and telephone conversations, handwritten notes, records, instruments, specifications, notebooks, diaries, logs, minutes, plans, drawings, sketches, graphs, diagrams, blueprints, microfilms, photostats, photographs, tape recordings, charts, and motion pictures

which are in the control of, in the possession of, or known to Plaintiff. Documents that are protected by the attorney-client, work product, or any other recognized privilege are not included in these requests.

(b) Unless otherwise noted, the word “you”, “your” and “Plaintiff” shall mean Amber Mirza, and her agents, attorneys, investigators and other representatives in their capacity as such.

(c) The word “Complaint” shall mean Plaintiff’s Complaint with Docket #2.

(d) Unless otherwise specified, reference to the “Defendant” shall mean MAESTRO HEALTH, INC., including any and all of its agents, employees, supervisors, attorneys, investigators, and other representatives acting in their capacity as such.

#### **DOCUMENT REQUESTS**

1. Copies of all records showing any financial obligations (including but not limited to credit card debt, outstanding loans, collections proceedings, overdue property rental obligations, overdue mortgage obligations) or outstanding payments owed by you from March 1, 2014 to present day.

#### **RESPONSE:**

2. Copies of all documents including but not limited to correspondence such as text messages and emails between you and your ex-husband, your mother, and any other family member with whom you had strained relationships, whether or not related to Defendant, and including as mentioned in the May 7 Records, from March 1, 2015 to present day.

#### **RESPONSE:**

3. Copies of all documents including but not limited to correspondence such as text messages, emails, religious letters, decrees, and other religious-correspondence, in any way involving the divorce you had after March 1, 2016.

**RESPONSE:**

Date: May 17, 2018

Respectfully submitted,

O'HAGAN MEYER, LLC

By: /s/Sukrat A. Baber

\_\_\_\_\_  
Attorneys for Maestro Health, Inc.

Kristine S. Phillips  
Sukrat A. Baber  
O'HAGAN MEYER LLC  
One E. Wacker Dr., Suite 3400  
Chicago, Illinois 60601  
PH: 312.422.6100  
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[kphillips@ohaganmeyer.com](mailto:kphillips@ohaganmeyer.com)  
[sbabar@ohaganmeyer.com](mailto:sbabar@ohaganmeyer.com)

**CERTIFICATE OF SERVICE OF DISCOVERY**

This is to certify that on May 17, 2018, a true and correct copy of Defendant, Maestro Health, Inc.'s:

**• Third Set Of Document Requests Directed To Plaintiff**

Was served upon the following parties by electronic mail, addressed to:

Attorney for Plaintiff

Douglas P. Trent  
Marc P. Trent  
Law Office of Trent & Butcher  
350 S. Schmale Rd., Ste. 130  
Carol Stream, IL 60188  
PH: 630.682.3100  
FX: 630.682.3554  
lawyers@trentandbutcher.com

Respectfully submitted,

O'HAGAN MEYER, LLC

By: /s/Sukrat A. Baber

\_\_\_\_\_  
One of the Attorneys for Maestro Health,  
Inc.

Kristine S. Phillips, Bar ID # 6273374  
Sukrat A. Baber, Bar ID # 6319022  
O'Hagan Meyer LLC  
One E. Wacker Dr., Suite 3400  
Chicago, Illinois 60601  
Telephone: 312.422.6100  
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kphillips@ohaganmeyer.com  
sbaber@ohaganmeyer.com

File No. 26123-KSP

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

AMBER MIRZA,	)	
	)	
Plaintiff,	)	
	)	Case No. 17-cv-04569
v.	)	
	)	Judge Jorge L. Alonso
MAESTRO HEALTHCARE	)	
TECHNOLOGY, INC.,	)	Magistrate Judge Maria Valdez
	)	
Defendant.	)	

**DEFENDANT'S**  
**THIRD SET OF INTERROGATORIES DIRECTED TO PLAINTIFF**

Defendant, MAESTRO HEALTHCARE TECHNOLOGY, INC., (“Defendant”) through its attorneys, Kristine S. Phillips and Sukrat A. Baber, requests that Plaintiff, Amber Mirza (“Plaintiff”), answer the following Interrogatories pursuant to Fed. R. Civ. P. 33 within thirty (30) days after service of this request. These requests are continuing and answers must be supplemented by Plaintiff until trial.

**DEFINITIONS**

(a) The word “document” shall mean all types of recorded information or writings of any nature including, but not limited to, originals and copies of speeches, contracts, letters, envelopes, telegrams, memoranda, routing slips, reports, studies, statements, computer printouts, other computer media, E-mails, pamphlets, pleadings, filings, worksheets, tabulations, records of meetings, conferences and telephone conversations, handwritten notes, records, instruments, specifications, notebooks, diaries, logs, minutes, plans, drawings, sketches, graphs, diagrams, blueprints, microfilms, photostats, photographs, tape recordings, charts, and motion pictures

which are in the control of, in the possession of, or known to Plaintiff. Documents that are protected by the attorney-client, work product, or any other recognized privilege are not included in these requests.

(b) Unless otherwise noted, the word “you”, “your” and “Plaintiff” shall mean Amber Mirza, and her agents, attorneys, investigators and other representatives in their capacity as such.

(c) The word “communicate” or “communicated” shall mean communication through any and all possible means including, but not limited to, communication verbally, in writing via any document, directly, or indirectly.

(d) The word “Complaint” shall mean Plaintiff’s Complaint, with Docket #2.

(e) Unless otherwise specified, reference to the “Defendant” shall mean Maestro Healthcare Technology, Inc. including any and all of its agents, employees, supervisors, attorneys, investigators and other representatives acting in their capacity as such.

### **INTERROGATORIES**

1. State all facts regarding any financial obligations, including but not limited to debts (including but not limited to credit card debt), outstanding loans, collections proceedings, overdue property rental obligations, overdue mortgage obligations, or any other outstanding financial obligations you had from March 1, 2014 to present day. This should include, without limitation:

- a. All companies or individuals which/whom you were indebted to and for what you were indebted (e.g., your credit card companies);
- b. The amount of any outstanding debt as of March 1 of 2014, 2015, 2016, 2017, and present day; and
- c. Whether and how you relate each debt to the acts or omissions of Defendant.

### **ANSWER:**

2. All facts regarding the family members who were mentioned, at any time, during your treatment for medical or psychological issues from March 1, 2014 to present day, including as stated in the treatment records produced by you on May 7, 2018 ("May 7 Records"). This should include, without limitation:

- a. The names, addresses, and phone numbers of each family member;
- b. To what extent, and how, your relationship with each family member was affected by the acts or omissions of Defendant;
- c. To what extent, and how, your relationship with each family member was affected by circumstances unrelated to Defendant;
- d. Which of the family members wanted you to obtain settlement funds as part of this lawsuit as indicated in the May 7 Records, and their motivation for your obtaining of those funds; and
- e. The details of the "cultural issues" mentioned in the May 7 Records including which family members were implicated in those cultural issues, and how if at all, those issues relate to Defendant.

**ANSWER:**

Date: May 17, 2018

Respectfully Submitted:

MAESTRO HEALTHCARE  
TECHNOLOGY, INC.,

By: /s/Sukrat A. Baber  
One of their attorneys  
O'HAGAN MEYER LLC

Kristine S. Phillips, Bar ID # 6273374  
Sukrat A. Baber, Bar ID # 6319022

O'Hagan Meyer LLC  
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[sbaber@ohaganmeyer.com](mailto:sbaber@ohaganmeyer.com)



**CERTIFICATE OF SERVICE OF DISCOVERY**

This is to certify that on May 17, 2018, a true and correct copy of Defendant, Maestro Health, Inc.'s:

**• Third Set Of Interrogatories Directed To Plaintiff**

Was served upon the following parties by electronic mail, addressed to the below-listed email address:

Douglas P. Trent  
Marc P. Trent  
Law Office of Trent & Butcher  
350 S. Schmale Rd., Ste. 130  
Carol Stream, IL 60188  
PH: 630.682.3100  
FX: 630.682.3554  
[lawyers@trentandbutcher.com](mailto:lawyers@trentandbutcher.com)  
*Attorney for Plaintiff*

Respectfully Submitted

/s/Sukrat A. Baber  
One of the Attorneys for  
Defendant, Maestro Health, Inc.

Kristine S. Phillips, Bar ID # 6273374  
Sukrat A. Baber, Bar ID # 6319022  
O'Hagan Meyer LLC  
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